

INTERNATIONAL BROADCASTING BUREAU

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Federal Communications Commission
Office of the Secretary

January 26, 2005

Mr. Edmond J. Thomas, Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th St, S.W.
Washington, DC 20554

ET Docket No. 04-139

Dear Mr. Thomas:

The Broadcasting Board of Governors (BBG) supports the Commission's rulemaking actions amending Parts 2 and 73 of its Rules to implement the World Radiocommunication Conference (Geneva, 2003) (WRC-03) decisions regarding High Frequency Broadcasting (HFBC). As part of the Interdepartment Radio Advisory Committee (IRAC) coordination process, we have reviewed the draft Report and Order in ET Docket No. 04-139 and provide the following comments.

We note the thoroughness in your consideration of transition and implementation requirements that the WRC-03 reallocation decisions place on the concerned services. We also believe that the Commission's proposed amendments correctly interpret the WRC reallocation decisions, and simplify the understanding of how these new rules are applied. This especially applies to those HFBC allocations where the distinction between "co-primary" and "exclusive" status is described, and how Regional requirements and transition timeframes are considered therein. In particular, we believe that the reorganization of the rule section dealing with the assignment and use of frequencies is clearer and also corrects several errors.

Along with the National Association of Shortwave Broadcasters (NASB), we strongly support the proposed system specifications and note they are consistent with Appendix 11 of the ITU Radio Regulations. We also believe that the revised draft rules are clearer in that the system requirements for double-sideband (DSB), single-sideband (SSB), and digitally modulated emissions have been placed in separate sections.

The BBG supports NASB's request that the Commission adopt the Digital Radio Mondiale (DRM) standard as a requirement for digital HFBC transmission. In this regard, we observe that DRM is the only internationally approved standard for digital HFBC transmission and that no other standard is being considered at this time. We believe that if the Commission were to adopt the DRM standard the digital HFBC transition will be shortened

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The BBG recommends that the Commission adopt 10 kW mean power as the minimum power level for digital HFBC, and we fully support the views of the NASB in this regard. The BBG has extensive testing experience utilizing DRM, and this testing validates the 7 dB provisional planning criteria regarding DRM versus analog DSB transmission. Further, as a DRM consortium member, and using our Morocco transmitting station, the BBG provided demonstrations of digital HFBC to the attendees of WRC-03 in Geneva. These very successful demonstrations used power levels of 10 kW.

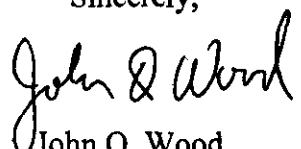
The BBG recommends that the Commission adopt 50 kW as the minimum peak envelope power for SSB emissions because this power level provides approximately the same coverage area as a DSB signal with 50 kW of carrier power.

On April 1, 2007, the transition period for the ten frequency bands that are being reallocated to the broadcasting service on an exclusive basis (the WARC-92 bands) will conclude. At that time, we anticipate that many out-of-band HFBC operations will seek to relocate to these bands. The BBG encourages the Commission to recommend to its fixed and mobile service licensees in the WARC-92 bands that they carefully evaluate whether their operation can coexist with these high-power stations without causing harmful interference to the reception of international broadcast programming. We understand that several of the WARC-92 bands are not currently licensed for use by the non-Federal fixed and mobile services. We recommend that the Commission delete these unused allocations.

The BBG observes that in 2007, Schedule B commences on March 25 (not April 1) and thus, we recommend that the Commission advance the effective date of the WARC-92 HFBC bands in the United States by one week. This action would permit more effective seasonal planning.

Thank you for your consideration of these comments. If you should have any questions, please contact me at (202) 619-1759.

Sincerely,


John O. Wood,
BBG IRAC Representative